

EXHIBIT A



Thomas Maniotis <tamaniotis@equitylegal.net>

Fwd: URGENT: Twitter post doxxing Defendants

Joseph McBride <jmcbride@mcbridelawnyc.com>

Wed, Jul 19, 2023 at 6:38 PM

To: Dani Pinter <dpinter@ncoselaw.org>, Thomas Maniotis <tamaniotis@equitylegal.net>, Paul Ingrassia <paul@mcbridelawnyc.com>

Cc: "TateLegal@McbrideLawNYC.com" <TateLegal@mcbridelawnyc.com>

Ms. Pinter,

The link has been taken down out of an abundance of caution.
Contrary to your assertion, no rule has been violated.

You, however, have failed to identify yourself as to whom you are representing correctly.
In that vein, I ask you this: What are the names of the people you represent?
If service has not been made (I believe you are wrong), will you accept service on your client's behalf?

You are miles off from reality in your assertion regarding doxxing, defined as gathering an individual's personally identifiable information and disclosing it publicly for malicious purposes. The notion, therefore, that information extensively published online against Andrew and Tristan Tate constitutes doxxing because it was tweeted is sheer madness.

Warm Regards,

[Quoted text hidden]



Thomas Maniotis <tamaniotis@equitylegal.net>

Motion for Extension of Time

2 messages

Dani Pinter <dpinter@ncoselaw.org>

Mon, Aug 21, 2023 at 12:59 PM

To: Thomas Maniotis <tamaniotis@equitylegal.net>

Cc: Peter Gentala <pgentala@ncoselaw.org>, "tamaniotisesq@gmail.com" <tamaniotisesq@gmail.com>, "cwaugh@waugh.legal" <cwaugh@waugh.legal>

Good Afternoon Mr. Maniotis,

According to local rule 7.1 I am reaching out to you regarding a motion for extension of time. In light of the Court's Order to show cause regarding removal (attached), we will be seeking an extension of time on behalf of [REDACTED] and [REDACTED] to respond to your complaint while we brief the jurisdictional issues. We would like to ask for 30 days from the time the Court resolves removal/jurisdiction of the case. Please let me know if you are opposed to this motion. Please respond by 5pm est so we can indicate your position to the Court.

Thank you,

Dani Bianculli Pinter

Senior Legal Counsel | National Center on Sexual Exploitation

1201 F St NW, Suite 200, Washington, DC 20004

e: dpinter@ncoselaw.org

w: EndSexualExploitation.org



NATIONAL CENTER ON SEXUAL EXPLOITATION
EndSexualExploitation.org



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146K

Thomas Maniotis <tamaniotis@equitylegal.net>

Mon, Aug 21, 2023 at 2:57 PM

To: Dani Pinter <dpinter@ncoselaw.org>

Cc: Peter Gentala <pgentala@ncoselaw.org>, tamaniotisesq@gmail.com, cwaugh@waugh.legal, Joseph McBride <jmcbride@mcbridelawnyc.com>

Good afternoon Ms. Pinter,

Plaintiffs are not in a position to agree to an additional 30 days to answer nor to respond to any order to show cause. It is simply too protracted due to the amount of damage your clients have already inflicted with fabricated allegations. Therefore, we will not agree to an extension because doing so would be harmful to our clients' interests. It has been noted that Defendants give Plaintiffs two hours notice to answer an email to convey their position to the court. Ironically, I still have not received a response to my last email regarding representation or service on the unserved defendants a week ago. In the future, absent provable emergencies, we will not entertain or accede to any demand to respond to an email within two hours or any other random time.

Furthermore, per your interview, [REDACTED] is in "hiding." Importantly, SDFL has correctly pointed out that her state of residence has not been identified in the notice of removal. After the notice of removal, it is clear that you all are in contact with all the unserved defendants. Once more, to painstakingly reiterate, you have been previously asked about your representation of the unserved defendants and if you would accept service.

Please indicate to the court that we do not agree to any extension of time, as with each day that passes, Plaintiffs are further damaged by your clients intentional and reckless conduct. It is perplexing the need to delay every filing by 30 days at a time with six attorneys working on behalf of the defendants.

Joseph McBride, copied here, is co-counsel on this case. He should be copied on all future correspondence.

Sincerely,

Thomas Maniotis

[Quoted text hidden]

--

Thomas Maniotis, Esq.
Attorney at Law
Equity Legal
5201 Blue Lagoon Drive, Floor 8
Miami, FL 33126
Email: tamaniotis@equitylegal.net
Phone: 321-313-8642
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Thomas Maniotis <tamaniotis@equitylegal.net>

Tate et al. v. [REDACTED] et al.

2 messages

Thomas Maniotis <tamaniotis@equitylegal.net>

Fri, Aug 11, 2023 at 11:41 AM

To: dpinter@ncoselaw.org
Cc: lawcenter@ncose.com

Dear Ms. Pinter,

I have received your motion for extension of time to respond to the complaint. However, as you know, you and your clients had notice of this case thirty days ago when you sent an email to co-counsel for Andrew and Tristan Tate. Of course, your clients [REDACTED] were served July 17, 2023. As far back as July 15, 2023, news articles quoted that "we are evaluating next steps". Then, you and your clients wait until the eleventh hour to request an additional 30 days.

As such, my clients will not agree to your motion for extension of time and have responded accordingly. We will be setting the motion for default hearing and providing notice, as required by Florida case law.

Additionally, please indicate whether you will accept service on behalf of [REDACTED] and [REDACTED] as a few of your interview statements indicate that [REDACTED] and [REDACTED] are hiding, presumably avoiding service, as your served clients told process servers that they are "estranged" from [REDACTED]. I have prepared the diligent search affidavits, information, and motion.

Sincerely,

Thomas Maniotis

--

Thomas Maniotis, Esq.
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Dani Pinter <dpinter@ncoselaw.org>

Fri, Aug 11, 2023 at 2:42 PM

To: Thomas Maniotis <tamaniotis@equitylegal.net>
Cc: "tamaniotisesq@gmail.com" <tamaniotisesq@gmail.com>

Good Afternoon Mr. Maniotis,

As we timely filed a motion for enlargement of time, which you acknowledge, we are entitled to a hearing on our motion prior to your motion for default. Additionally, we believe your opposition to our motion for additional time in this circumstance is not reasonable, and even cuts against the Florida Rules of Professional Conduct which advises that first such requests should be granted.

Moreover, Florida case law does not favor default judgments and we do not believe your motion seeking default, less than 30 days since the case was filed, is appropriate.

Sincerely,

Dani Bianculli Pinter
Senior Legal Counsel | National Center on Sexual Exploitation
1201 F St NW, Suite 200, Washington, DC 20004

e: dpinter@ncoselaw.org

w: EndSexualExploitation.org



NATIONAL CENTER ON SEXUAL EXPLOITATION
EndSexualExploitation.org

From: Thomas Maniotis <tamaniotis@equitylegal.net>

Sent: Friday, August 11, 2023 1:41 PM

To: Dani Pinter <dpinter@ncoselaw.org>

Cc: NCOSE Law Center <lawcenter@ncose.com>

Subject: Tate et al. v. [REDACTED] et al.

[Quoted text hidden]



Thomas Maniotis <tamaniotis@equitylegal.net>

Re: Tate et al. v. [REDACTED] et al.

1 message

Thomas Maniotis <tamaniotis@equitylegal.net>

Mon, Aug 14, 2023 at 12:58 PM

To: Dani Pinter <dpinter@ncoselaw.org>

Cc: Joseph McBride <jmcbride@mcbridelawny.com>, tamaniotisesq@gmail.com, lawcenter@ncose.com

Good afternoon Ms. Pinter,

In reference, to the motion for extension effectively tolling proceedings, Florida case law indicates that filing a motion for extension of time does not toll proceedings or other time to respond. Neither is it required to hear the extension of time prior to the continuation of the matter or hearing on the motion for default. Please provide case law evidencing such a position regarding hearing a motion for extension prior to entering a default. Upon such a showing of current case law, we will consider withdrawing the default motion. Otherwise, Plaintiffs will continue forward with this matter.

Last point on the extension, no effort has been made on your part to set a hearing date for the extension, nor even courtesy to ask for the extension, just a filing at the eleventh hour and then a demand for extension on your part. Case law is straightforward, regardless if you feel entitled or not.

Ms. Pinter, once more, please note that you completely avoided the question regarding your representation of [REDACTED] and [REDACTED]. I suppose common sense would dictate, based on your email correspondence to co-counsel, the quote in the article, the well-known letter to Marlin Fisher, and the fact that you are representing [REDACTED] parents, you do represent [REDACTED] and more than likely [REDACTED]. As you seem to not want to answer the question of representation or acceptance of service, we will be moving forward with alternative service of process for [REDACTED] and [REDACTED].

Regarding your statement "cuts against the rules of Professional Conduct," as you state, the rule "advises" and does not require because there are circumstances where it is not reasonable; especially, under the circumstances that your clients have perpetrated against my clients. While Florida does favor resolving cases on their merits, case law does not give Defendants free reign to delay answering with insignificant filings; therefore, the motion for default is suitable. Plaintiffs are not willing to be flexible with deadlines without an order of the court as they continue to incur enormous damages with each passing day.

Could you please address who is "we" that you often refer to in your correspondence?

Sincerely,

Thomas Maniotis

On Fri, Aug 11, 2023 at 4:42 PM Dani Pinter <dpinter@ncoselaw.org> wrote:

Good Afternoon Mr. Maniotis,

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Sincerely,

Dani Bianculli Pinter**Senior Legal Counsel | National Center on Sexual Exploitation**

1201 F St NW, Suite 200, Washington, DC 20004

e: dpinter@ncoselaw.org



From: Thomas Maniotis <tamaniotis@equitylegal.net>
Sent: Friday, August 11, 2023 1:41 PM
To: Dani Pinter <dpinter@ncoselaw.org>
Cc: NCOSE Law Center <lawcenter@ncose.com>
Subject: Tate et al. v. [REDACTED] et al.

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As such, my clients will not agree to your motion for extension of time and have responded accordingly. We will be setting the motion for default hearing and providing notice, as required by Florida case law.

Additionally, please indicate whether you will accept service on behalf of [REDACTED] and [REDACTED] as a few of your interview statements indicate that [REDACTED] and [REDACTED] are hiding, presumably avoiding service, as your served clients told process servers that they are "estranged" from [REDACTED]. I have prepared the diligent search affidavits, information, and motion.

Sincerely,

Thomas Maniotis

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